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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

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PERIODIC REPORTING
(Proposal Six)

Docket No. RM2015-15

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO MOTION OF THE PUBLIC REPRESENTATIVE SEEKING ISSUANCE OF AN INFORMATION REQUEST (August 10, 2015)

On August 6, 2015, the Public Representative filed a motion in this proceeding seeking the issuance of an Information Request. The Public Representative raised three items for consideration regarding the proposed new treatment of Click-N-Ship Priority Mail in the RPW system. The United States Postal Service hereby responds.

The first question raised seeks identification and listing of folders and spreadsheets in the ACR that would be affected by the proposal. In effect, this question translates into nothing less than a request for identification of essentially all spreadsheets in all folders in the ACR that use inputs from the RPW. Nothing useful would be gained from such an exercise. It is obvious that RPW is a key input into many portions of the ACR, as indicated in the Preface to USPS-FY14-42, and nothing about this Proposal changes that. No further response to the first item is warranted.

The second question suggested by the Public Representative seeks the impact of the proposal on the FY2015Q1 estimates of *overall* Priority Mail data. The original Proposal explained the impact only relative to the Click-N-Ship portion of Priority Mail. Proposal Six (July 27, 2015) at 8. As indicated in the spreadsheet attached to this pleading electronically, under Proposal Six, it is estimated that the overall Priority Mail revenues and volumes in the Q1 FY2015 report would be lower by 0.41 percent and

0.45 percent respectively, with a correspondingly minimal effect on weight anticipated as well.

The third question relates to the broader proposed changes in RPW (specifically the BRAF mechanism) pending as Proposal One, and requests an indication of whether "the methodological changes proposed in Docket No. RM2015-9 [Proposal One] would provide any additional impact on the CNS Priority Mail revenue, pieces and weight." The answer to this question is that the approval of Proposal One would have no additional impact on the CNS estimates. The purpose of Proposal Six is to change to a census source of information for CNS, and, as such, any changes in the BRAF process emanating from Proposal One would have no effect. The BRAF process is only applied to non-census estimates.

In light of the above, and the new information provided, the Postal Service submits that there is no current need for the issuance of the Information Request sought by the Public Representative. Her motion can therefore be treated as moot, or denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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